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\*Attorney for Petitioner Nicolas Esteban Cavieres Gomez

11 UNITED STATES DISTRICT COURT  
12 DISTRICT OF NEVADA

13 Nicolas Esteban Cavieres Gomez,  
14 Petitioner,  
15 v.  
16 Christopher Chestnut, *et al.*,  
17 Respondents.

Case No. 2:25-cv-00975-GMN-BNW

**Stipulation and Order for  
Extension of Time to File First  
Amended Petition (First Request)**

18 Petitioner and Respondents, through their undersigned counsel, hereby  
19 stipulate and jointly request that the court extend the due date for Petitioner's first  
20 amended petition, up to and including August 8, 2025. This is the first request for  
21 an extension of time.

22 Petitioner filed this petition for writ of habeas corpus under 28 U.S.C. §2241  
23 on June 2, 2025.<sup>1</sup> Counsel granted Petitioner's motion to appoint counsel, and  
24 counsel from the Office of the Federal Public Defender was appointed on June 4,  
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27 <sup>1</sup> ECF No. 4.

1 2025.<sup>2</sup> Petitioner filed a motion for a temporary restraining order and preliminary  
2 injunction on June 9, 2025.<sup>3</sup> The Court held a hearing on that motion on June 14,  
3 2024. After hearing arguments from both parties, the Court denied the motion but  
4 ordered that Respondents provide Petitioner and Petitioner's counsel with 72-hour  
5 notice before removing or transferring him.<sup>4</sup> On July 3, this Court issued a  
6 scheduling order directing Petitioner to file an amended petition on or before July  
7 25, 2025.<sup>5</sup>

8 Counsel for Petitioner have been diligently working on the amended petition  
9 but require more time due to both attorneys for Petitioner being out of the office for  
10 travel and preplanned leave in the time since the scheduling order was issued.  
11 Specifically, attorney Barrera was out of the office for work-related travel from July  
12 9-11, and 20-21, and attorney Novillo was out of the office for annual leave and  
13 work-related travel from July 15-24. Undersigned counsel and counsel for  
14 Respondents, Christian Ruiz, have conferred regarding the need for an extension of  
15 time to file the amended petition and agree about the proposed extension of two  
16 weeks. This request is not sought for the purpose of delay but in the interest of  
17 justice and the interest of Petitioner.

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25 <sup>2</sup> ECF No. 3.

26 <sup>3</sup> ECF No. 8.

27 <sup>4</sup> ECF Nos. 12, 13.

<sup>5</sup> ECF No. 14.

1 Dated July 25, 2025.

2 Respectfully submitted,

3 Sigal Chattah  
4 United States Attorney

Rene L. Valladares  
Federal Public Defender

5 /s/ Christian R. Ruiz  
6 Christian R. Ruiz  
7 Assistant United States Attorney

/s/ Laura Barrera  
Laura Barrera  
Assistant Federal Public Defender

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10 IT IS SO ORDERED:

11   
12 UNITED STATES DISTRICT JUDGE  
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14 DATED: August 25, 2025  
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**Certificate of Service**

I hereby certify that on July 25, 2025, I electronically filed the foregoing with the Clerk of the Court for the United States District Court, District of Nevada by using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

*s/ Kaitlyn O'Hearn*

An Employee of the  
Federal Public Defender